

**USDA Child Nutrition Programs
Administrative Review Summary Report**

School Food Authority: Port Washington - Saukville School District **Agency Code:** 45-4515

School(s) Reviewed: Jefferson Middle School

Review Date(s): 1/24 – 1/26/17

Date of Exit Conference: 1/26/17

State agencies (SA) are required to conduct administrative reviews to assess School Food Authority (SFA)'s administration of the National School Lunch Program (NSLP), School Breakfast Program (SBP), and other school nutrition programs. The objectives of the Administrative Reviews are to:

- Determine whether the SFA meets program regulations,
- Provide technical assistance,
- Secure needed corrective action,
- Assess fiscal action, and when applicable, recover improperly paid funds.

General Program Reminders/Updates:

- The Department of Public Instruction (DPI) School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state at no charge. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, professional standards, procurement, and many other topics. More information along with other upcoming trainings and webinars can be found on the Wisconsin DPI School Nutrition Training webpage dpi.wi.gov/school-nutrition/training.
- SFA staff are encouraged to pursue GOALS Certification. GOALS stands for Goal Oriented Achievement Learning Skills. This is a certificate endorsed by the DPI and is obtained by completing training in nutrition, program administration and operations, and communications and marketing. For more information go to the Wisconsin DPI School Nutrition Training webpage dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills.
- SFAs are required to have a local meal charge policy in place no later than July 1, 2017. More information, resources, and best practices may be found on the Wisconsin DPI School Nutrition Financial Management webpage dpi.wi.gov/school-nutrition/national-school-lunch-program/financial, scroll down to the unpaid meal charges section.

Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the staff at Port Washington - Saukville School District for the courtesies extended to us during the on-site review. Thank you to the Secretary to the Director of Business Services, the Food Service Director, the Food Service Manager at the Middle School, the Determining Official, Administrative Staff, and Food Service Staff for being available when answering questions and providing additional information when necessary. Administrative and Food Service staff were very

receptive to recommendations and guidance. In addition, thank you for taking the time to respond to the off-site questions and requests, as well as pulling records for the on-site portion of the review.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Commendations

1. The December lunch claim was validated and consolidated correctly.
2. Direct Certification was run multiple times through the first half of the school year.
3. All DPI templates were used for regarding Free and Reduced Meal Applications, Verification, and Direct Certification.
4. Verification was done completely and well documented. It was started on October 1 and finished on November 11. The Verification Collection Report was submitted in December.

Technical Assistance and Program Requirement Reminders

1. Per page 51 of the Eligibility Manual, if a household has the same pay frequency listed on the application for multiple income sources, there is no requirement to annualize the income.
2. The free and reduced applications were well documented by the Determining Official and explicitly listed any income including calculations to determine the benefit status. Be sure to sign and date the applications when they are determined rather than stamping the applications with the date. Stamping the applications with a 'received date' is perceived to be the date the application has been received, not when the application was determined.
3. The notification letters to households regarding meal benefits need to be updated to have the USDA Non-Discrimination statement in the same font size as the rest of the content on the letter.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations and Appreciations

Sincere thanks to the Director of Food Services and to the site manager and school nutrition professionals of Thomas Jefferson Middle School. We appreciate your time and efforts spent preparing for and participating in the on-site review. Thank you also for your openness to feedback, both positive and constructive criticism. The Director of Food Services expressed interest in improving and growing current school meal programs. He also asked questions reflective of his understanding of program requirements. Staff at the middle school did a nice job helping students to select reimbursable meals. They also kept the meal service area clean and well-stocked. Best of luck with your upcoming renovation!

Technical Assistance and Program Requirement Reminders

Production Records

Production records are intended to be useful tools to record information prior to production, during production, and following production. All sections of the production record must be filled in completely each day. Daily production records show portion sizes of meal components were

appropriately planned and served. Please continue to work with all staff members to record planned usage, actual usage, and leftovers.

The lunch production record template currently in use is missing required information. While there is no required template, there are examples on our website: <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records>. The current template must be updated to include the following required information for continued use:

- Menu type
- Grade grouping(s)
- Menu item with recipe name/reference number or product name/description
- Planned number of portions
- Total number of portions leftover
- Milk usage by type
- Planned portion size and actual usage for condiments and any extra menu items
- Actual number of reimbursable and non-reimbursable (adult) meals served

Additionally, substitutions made for students with special dietary needs must be recorded. Write this information on the same or on a separate production record. Keep dietary request forms on file as supporting documentation.

Be specific about the identity, brand, and description of the items served. Instead of “fresh veggies” or “fresh fruit”, list the specific type. Those descriptions may be listed on menus for flexibility and to save space, but they are not detailed enough for production records.

Production records for the garden bar at Thomas Jefferson Middle School were not submitted. This documentation is required to credit the fruit, vegetables, and meat/meat alternates toward the meal pattern. As a result, weekly vegetable subgroup requirements are not being met.

Vegetable Subgroups

Each vegetable subgroup has a specific minimum weekly requirement. These requirements are outlined on the Lunch Meal Pattern Table, located at the following address: <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/lunch-mpt.pdf>. During the week of review, the beans/peas vegetable subgroup minimum weekly requirement was not met. Consider serving baked beans or refried beans from the steamtable or garbanzo beans or black beans from the garden bar.

Signage

Adequate signage helps ensure students accurately select a reimbursable meal. Signage should be posted near the beginning of the serving line. Update signage daily to include all menu items. Indicate clearly to students how many components at lunch must be taken to constitute a reimbursable meal. If you are interested in ordering signage from the DPI School Nutrition Team, please visit <http://dpi.wi.gov/team-nutrition> and complete the Resource Order Form.

Crediting Documentation

Food manufacturers continually reformulate products used in schools. It is important to stay current with these changes and be confident that the documentation on file matches the products in stock. These records should be reviewed and updated at least annually and as new products are purchased or substituted. Also, please be sure to discard any outdated crediting information for products that have changed or that are no longer purchased. State-Processed Products and USDA Brown-Box Foods have fact sheets, detailing meal pattern contributions. The fact sheets are updated annually. USDA

Brown-Box Foods fact sheets can be found here: <http://www.fns.usda.gov/fdd/nsfp-usda-foods-fact-sheets>. State-Processed Products fact sheets can be found here: http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/wiprocessed_nutritioninfo_1617.pdf.

Acceptable crediting documentation was not available for Oscar Mayer beef franks, Highliner Seafood cod nuggets, corn dogs, or chips. These processed foods must be accompanied by a product formulation statement (PFS) or a Child Nutrition (CN) label to sufficiently document meal component crediting. Please provide crediting information for these product by securing a CN label from the packaging or a PFS directly from the manufacturer. If proper documentation cannot be obtained, discontinue using these products for school meals. More information about crediting documentation can be found at: <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/meal-pattern>.

Minimum Weekly Requirements

Students must be offered 8 ounce equivalents of meat/meat alternate and 8 ounce equivalents of grain to meet minimum weekly requirements. The Uncrustable peanut butter and jelly sandwich, available every day, credits as 1 ounce equivalent of meat/meat alternate and 1 ounce equivalent of grain per the product formulation statement. A student who selects an Uncrustable every day only has access to 5 ounce equivalents of meat/meat alternate and 5 ounce equivalents of grain per week, 3 ounce equivalents short of both minimum weekly requirements. To rectify this shortage, we recommend pairing the peanut butter and jelly sandwich with another food item that credits toward the meat/meat alternate and/or grain components.

Standardized Recipes

Standardized recipes are required for all menu items that have more than one ingredient (e.g., sandwiches). All standardized recipes must include detailed information about the specific ingredients, equipment, and procedures used to prepare the recipes. A standardized recipe is a recipe that has been tried, tested, evaluated, and adapted for use by a food service operation. It produces a consistent quality and yield every time when the exact procedures, equipment, and ingredients are used, which is crucial for crediting school food service recipes. Recipes should be standardized in each production kitchen to reflect the products and practices that are used in that kitchen. Instructions for standardizing recipes and recipe templates were left onsite and can be found at <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes>.

Smart Snacks

Of the reviewed products, four do not meet Smart Snacks criteria. Remaining inventory of the noncompliant products listed below may be sold. Do not order or purchase them going forward.

- Fritos
- Curious George fruit snacks
- Fruit roll-up crazy color
- Aqua Ball naturally flavored drinking water

Similar products can be found in Smart Snacks compliant varieties and/or portion sizes, such as corn chips made with whole corn. Fruit snacks can be compliant if the first ingredient is fruit juice or fruit puree. The [Smart Food Planner](#) from the Alliance for a Healthier Generation may be helpful.

Please note, snack-type fruit products such as 100% fruit strips, leathers, and drops are not creditable toward the fruit component of a reimbursable meal. Similarly, potato chips are considered an extra when offered with a reimbursable meal and are not creditable toward the vegetable component.

Retain up-to-date crediting documentation and nutrition facts labels, including the ingredient statement, with results printouts from the Smart Snacks Calculator for all foods and beverages sold to students during the school day.

Daily A La Carte Options

Items listed on the menu as “daily a la carte options” are also alternate entrees for reimbursable meals. The entrees comprise the meat/meat alternate and grain components, and the price(s) includes milk, fruit, vegetables, and access to the garden bar. A la carte infers these foods are sold individually. To reduce confusion among students as well as to clarify production records, we suggest changing the menu description to more accurately reflect these options as part of a reimbursable meal. They may continue to be sold a la carte as well.

Corrective Action

Meal Pattern Finding 1: Current production records do not include all required information.

Required Corrective Action: Update the lunch production record to include the following missing information: menu type; grade grouping(s); menu item with recipe name/reference number or product name/description; planned number of portions; total number of portions leftover; milk usage by type; planned portion size and actual usage for condiments and any extra menu items; actual number of reimbursable and non-reimbursable (adult) meals served.

Please submit one full week of completed production records, updated to reflect these requirements.

Meal Pattern Finding 2: Insufficient crediting documentation for Oscar Mayer beef franks, Highliner Seafood fish nuggets, corn dogs, chips, and sandwiches.

Required Corrective Action: Please submit product formulation statements (PFS), child nutrition (CN) labels, or standardized recipes for these five items. If proper documentation cannot be obtained, discontinue using these products for school meals and submit crediting documentation for replacement products.

Meal Pattern Finding 3: Weekly vegetable subgroup requirements are not being met as a result of missing production records for the garden bar.

Required Corrective Action: Please submit production records for the garden bar for the week of review. If shortages are identified, you will be asked to submit a statement describing how you will alter the menu to meet the requirements going forward.

Meal Pattern Finding 4: Signage is not posted near the beginning of the service line.

Required Corrective Action: Please submit a photo of signage near the beginning of the service line, which will help ensure students accurately select a reimbursable meal. You may move current signage or install new signage.

Meal Pattern Finding 5: Weekly minimum requirements for the meat/meat alternate and grain components are not being met as a result of the Uncrustable peanut butter and jelly sandwich offered daily. The Uncrustable credits as 1 ounce equivalent of meat/meat alternate and 1 ounce equivalent of grain.

Required Corrective Action: Please submit an updated menu or statement describing how you will alter the menu to meet the requirements going forward.

Meal Pattern Finding #6: Missing component during the week of review and on the day of onsite review. Students who selected the omelet, sausage links, tater tots, juice, and fruit and veggie bar did not have access to the grain component. The daily minimum requirement is one ounce equivalent of grain. The grain component was not missing from any other reimbursable meals offered during the month of review.

Required Corrective Action: Please submit an updated menu or statement describing how you will alter the menu to meet the requirements going forward. **Incomplete meals claimed for reimbursement during the week of review and on the day of onsite review will be subject to fiscal action.**

3. RESOURCE MANAGEMENT

Commendations

The 16-17 Paid Lunch Equity Tool was well done. The 17-18 PLE tool for Port Washington was completed on site and left for the district to use.

Comments/Technical Assistance/Compliance Reminders

1. The Resource Management Risk Assessment Tool was completed with 1 flag. A comprehensive review of non-program foods was required.
2. USDA Policy Memorandum SP 46-2016 requires all SFAs operating federal school meal programs, by July 1, 2017, to have a written and clearly communicated policy that addresses unpaid meal charges.

For a snap-shot on what the policy must include, see the Unpaid Meal Charges In a “Nutshell”: <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/unpaid-meal-charges-nutshell.pdf>.

For a more comprehensive overview, see SP 58-2016: Unpaid Meal Charges Guidance: <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-58-2016.pdf>

- Best Practices
- Local meal charge policy checklist
- Sample outstanding balance letter
- Sample robo-call script

4. GENERAL PROGRAM COMPLIANCE

Commendations

1. The Food Safety plan was well done and had all of the required components.
2. The first Food Safety Inspection was completed in November and the next inspection will be after the New Year sometime.
3. On-site monitoring forms for the sites reviewed were completed prior to February 1 and well documented. The rest of the sites will have to be monitored prior to February 1.

Comments/Technical Assistance/Compliance Reminders

Special Dietary Needs:

- All food substitutions made outside of the meal pattern requirements must be supported by a signed medical statement from a licensed medical professional. You may use the prototype Medical Statement for Special Dietary Needs posted on our website which is also available in Spanish and Hmong: <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>.
- SFAs must accommodate dietary requests that are supported by a signed medical statement from a licensed medical practitioner. Meals served to a students with special dietary needs who have a signed medical statement from a licensed medical practitioner do not need to meet meal pattern requirements. Additional information on special dietary needs can be found on the DPI School Nutrition Team website: <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>.
- School food service staff may make food substitutions, at their discretion, for children for whom they do not have a signed medical statement from a licensed medical practitioner. It is highly recommended that the SFA have a completed medical statement on file from a medical authority (which could be the school nurse) to support the request. Accommodations made for students without a signed medical statement from a licensed medical practitioner must meet the USDA meal pattern requirements in order for the meals to be reimbursable. It is recommended that the SFA develop a policy for handling these types of accommodations to ensure that requests are equitable for everyone.

Professional Standards:

- Annual training must be job-specific and intended to help employees perform their duties well. The required annual training hours vary according to the employee's role in the management and operation of the school nutrition program.
- Training obtained since April 1, 2015 may count towards training requirements. Trainings can be provided in a variety of formats (online, in person, webinars) and through various providers (DPI, USDA, in-house, etc.).
- SFAs should clearly document all required training information and maintain that file including the name of staff person, date hired, title/position, brief list of core duties/responsibilities, status (full, part-time, volunteer, etc.), professional standards position (director, manager or staff). Learning codes are not required, but encouraged. A template tracking tool is posted to our website at <http://dpi.wi.gov/school-nutrition/training/professional-standards>.

Findings and Corrective Action Needed

❑ **Finding #1:** The And Justice For All poster and the most recent food safety inspections are not posted in a prominent public location for all to see.

Corrective Action Needed: Post the And Justice For All poster and the most recent food safety inspection in the glass case within the cafeteria at the Middle School. Email a picture of the case to confirm these have been posted in the cafeteria.

❑ **Finding #2:** Missing the second most recent food safety inspection.

Corrective Action Needed: Scan and email a copy of this.

5. OTHER FEDERAL PROGRAMS REVIEWS

Commendations

1. The December claim for the Special Milk Program was validated on-site. It was clear, concise, and correct. Great job!

Comments/Technical Assistance/Compliance Reminders

1. This is a reminder that the regulations require that the SFA inform eligible families before the end of the school year of availability and location(s) of any Summer Food Service Programs located in the geographic area of the SFA. Information on this can be found on our website at <http://dpi.wi.gov/community-nutrition/sfsp>. There is a link at the bottom of the page that shows a map of all the places in the area offering the Summer Food Service Program. Families can also call 211 to get accurate dates and time of locations operating the Summer Food Service Program.
2. The local wellness policy requirement was established by the Child Nutrition and Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) Reauthorization Act of 2004 and further strengthened by the Healthy, Hunger-Free Kids Act of 2010 (HHFKA). The final rule requires School Food Authorities (SFAs) to begin developing a revised local school wellness policy during School Year 2016-2017 and full compliance with the requirements of the final rule by June 30, 2017.

The Wellness Policy should include:

- a. Specific measurable goals for nutrition promotion and education, physical activity, and other school-based activities that promote student wellness.
- b. Nutrition guidelines to promote student health and reduce childhood obesity for all foods available in each school district.
- c. At a minimum, SFAs must permit participation by the general public and the school community including parents, students, and representatives of the school food authority, teachers of physical education, school health professionals, the school board, and school administrators in the wellness policy process.
- d. Inform and update the public (including parents, students, and others in the community) about the content and implementation of local wellness policies on school website, social media, newspaper, or newsletters.
- e. Document public involvement, public updates, policy leadership, and evaluation plan.

- f. SFAs must complete an assessment of the policy every three years to determine compliance with the wellness policy, how the wellness policy compares to model policies, and process made in attaining the goals of the wellness policy.
- g. SFAs must make the Triennial Assessment available to the public. In addition, SFAs must make available to the public the wellness policy and any updates to the wellness policy on an annual basis. Some methods of notification include mailing flyers, newsletters, emails, website postings, and newspaper articles.

A summary of the requirements can be found at:

https://healthymeals.nal.usda.gov/sites/healthymeals.nal.usda.gov/files/uploads/LWPsummary_finalrule.pdf. USDA Food and Nutrition Service has information on the local school wellness policy process and wellness policy elements at: <https://healthymeals.nal.usda.gov/school-wellness-resources>. Wisconsin Team Nutrition has several wellness policy resources available including a toolkit, a wellness policy builder, and wellness policy report card at: <http://dpi.wi.gov/school-nutrition/wellness-policy>.

Dr. Tony Evers, State Superintendent of Wisconsin Department of Public Instruction, shares a vision that every student will graduate prepared for college and career in an initiative called “Agenda 2017”. His goals are for students to have the knowledge, skills, and habits that will allow them to succeed in life after high school. Access to quality nutrition plays a major role in developing those life-long habits.

The School Nutrition Team believes that what school nutrition programs do every day plays a very important part in the success of every child being able to graduate. We all know that well-nourished children are ready to learn. Thank you for all you do to ensure your students’ success.

For more information on this initiative, please visit the Wisconsin DPI Every Child a Graduate webpage dpi.wi.gov/statesupt/agenda-2017.

